IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA SAVANNAH DIVISION

JEROME BLIGE, MARSHELL	
BERNICE LEE, and the ESTATE OF	
SAUDI ARAI LEE,	
Plaintiffs,))
vs.	,))
ERNEST FERGUSON IN HIS)
INDIVIDUAL CAPACITY; JOHN DOE)
OFFICER IN HIS INDIVIDUAL	
CAPACITY; CITY OF SAVANNAH,	
Defendants.	

THE MAYOR AND ALDERMEN OF THE CITY OF SAVANNAH'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT

NOW COMES The Mayor and Aldermen of the City of Savannah (incorrectly named herein as "City of Savannah, Georgia") ("Defendant") and files this Motion to Dismiss Plaintiffs' Complaint, pursuant to Fed. R. Civ. P. § 17(a) and 12(b)(6), and contemporaneously file its Memorandum in Support of this Motion and incorporate it herein by reference for all purposes.

WHEREFORE, Defendant respectfully requests that its motion be granted.

Respectfully submitted this 13th day of September 2024.

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

/s/Taylor L. Dove

Bradley M. Harmon Georgia Bar No. 327097 Taylor L. Dove Georgia Bar No. 993210 Attorneys for Defendants 200 East Saint Julian Street Post Office Box 9848 Savannah, Georgia 31412-0048

Telephone: 912.236.0261 Facsimile: 912.236.4936

Email: BHarmon@HunterMaclean.com Email: TDove@HunterMaclean.com

OFFICE OF THE CITY ATTORNEY

/s/R. Bates Lovett

R. Bates Lovett Georgia Bar No. 459568 Jennifer N. Herman Georgia Bar No. 327017

P.O. Box 1027

Savannah, Georgia 31402 Telephone: 912.525.3092 Facsimile: 912.525.3267

Email: BLovett@savannahga.gov Email: JHerman@savannahga.gov

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **DEFENDANT'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT** by using the CM/ECF system which will send a notice of electronic filing to all parties.

Respectfully submitted this 13th day of September 2024.

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

/s/ Taylor L. Dove Georgia Bar No. 993210 Attorneys for Defendants

P.O. Box 9848 200 East St. Julian St. Savannah, Georgia 31412-0048

Phone: (912) 236-0261 Fax: (912) 236-4936

E-Mail: tdove@huntermaclean.com